

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **Criminal No.** \_\_\_\_\_

**v.** : **Date Filed:** \_\_\_\_\_

**ALEXANDER ALAMO**  
**a/k/a “Flex”**

: **Violations:**  
: **21 U.S.C. §846**  
: **(Conspiracy to distribute cocaine base**  
: **(“crack”)) - 1 count**  
: **21 U.S.C. §841(a)(1)**  
: **(Distribution of cocaine base (“crack”))**  
: **- 4 counts**  
: **21 U.S.C. § 841(a)(1)**  
: **(Possession with intent to distribute in**  
: **excess of 50 grams of cocaine base**  
: **(“crack”)) - 1 count**  
: **21 U.S.C. § 860**  
: **(Distribution or possession with the intent**  
: **to distribute cocaine base (“crack”) near**  
: **a school - 5 counts)**  
: **18 U.S.C. § 924(c)(1)**  
: **(Possession of firearm in furtherance of a**  
: **drug trafficking crime) - 1 count**  
: **18 U.S.C. § 922(g)(1)**  
: **(Possession of a firearm by a convicted**  
: **felon) - 1 count**  
: **18 U.S.C. § 924(d) and 28 U.S.C. §2461(c)**  
: **(Notice of forfeiture)**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

From on or about January 9, 2003, to on or about April 9, 2003, at Reading, in the  
Eastern District of Pennsylvania, defendant

**ALEXANDER ALAMO**  
**a/k/a “Flex”**

conspired and agreed, with others known and unknown to the grand jury, to knowingly and

intentionally distribute a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

### **MANNER AND MEANS**

It was part of the conspiracy that:

1. Defendant ALEXANDER ALAMO and M. R., a person known to the grand jury, and others unknown to the grand jury, were members of a drug organization which distributed cocaine base (“crack”) in Reading between on or about January 9, 2003 and on or about April 9, 2003, and received cash in payment for the cocaine base (“crack”).
2. Defendant ALEXANDER ALAMO supplied cocaine base (“crack”) to other members of the organization for distribution in Reading.
3. Defendant ALEXANDER ALAMO directed others in the packaging and distribution of cocaine base (“crack”).

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were performed in Reading, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about January 9, 2003, defendant ALEXANDER ALAMO discussed the sale of cocaine base (“crack”) for \$100 with an undercover police officer in the Turkey Hill parking lot located at 425 N. 13th Street, Reading, Pennsylvania.
2. On or about January 9, 2003, following the discussion of the sale of cocaine base (“crack”) with the undercover officer, defendant ALEXANDER ALAMO accepted \$100 from

the officer and told her to wait, that “his boys were getting it ready now.”

3. On or about January 9, 2003, a person unknown to the grand jury, at the direction of defendant ALEXANDER ALAMO, distributed approximately 1.6 grams of cocaine base (“crack”) to an undercover police officer in Reading, Pennsylvania.

4. On or about March 21, 2003, defendant ALEXANDER ALAMO distributed approximately 1.6 grams of cocaine base (“crack”) to an undercover police officer for \$100 in Reading, Pennsylvania.

5. On or about March 26, 2003, defendant ALEXANDER ALAMO distributed approximately .98 grams of cocaine base (“crack”) to an undercover police officer in exchange for an air conditioner in Reading, Pennsylvania.

6. On or about March 26, 2003, M. R., a person known to the grand jury, assisted defendant ALEXANDER ALAMO in transporting the air conditioner obtained in exchange for cocaine base (“crack”) to the residence they shared.

7. On or about April 7, 2003, defendant ALEXANDER ALAMO distributed approximately 1.8 grams of cocaine base (“crack”) to an undercover police officer in Reading, Pennsylvania.

8. On or about April 9, 2003, defendant ALEXANDER ALAMO possessed with the intent to distribute approximately 83.3 grams of cocaine base (“crack”) in Reading, Pennsylvania.

9. On or about April 9, 2003, defendant ALEXANDER ALAMO possessed a Taurus, Model PA140, .40 caliber handgun, serial number SVG40299, loaded with eleven rounds of ammunition, and a Ruger, Model 85, 9 mm handgun, serial number 302-30741 loaded

with sixteen rounds of ammunition, in furtherance of his drug trafficking activities at 1327 Buttonwood Street, 2<sup>nd</sup> floor apartment, in Reading, Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 9, 2003, at Reading, in the Eastern District of Pennsylvania,  
defendant

**ALEXANDER ALAMO  
a/k/a “Flex”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.6 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 9, 2003, at Reading, in the Eastern District of Pennsylvania,  
defendant

**ALEXANDER ALAMO  
a/k/a “Flex”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.6 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the 13th and Green Elementary School, a public elementary school, located at 501 North 13th Street, Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 21, 2003, at Reading, in the Eastern District of Pennsylvania,  
defendant

**ALEXANDER ALAMO  
a/k/a “Flex”**

knowingly and intentionally distributed approximately 1.6 grams of a mixture or substance  
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 21, 2003, at Reading, in the Eastern District of Pennsylvania,  
defendant

**ALEXANDER ALAMO  
a/k/a “Flex”**

knowingly and intentionally distributed approximately 1.6 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Reading High School, a public high school, located at 801 North 13th Street, Reading in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860.



**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 26, 2003, at Reading, in the Eastern District of Pennsylvania,  
defendant

**ALEXANDER ALAMO**  
**a/k/a “Flex”**

knowingly and intentionally distributed approximately .98 grams of a mixture or substance  
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 26, 2003, at Reading, in the Eastern District of Pennsylvania,  
defendant

**ALEXANDER ALAMO  
a/k/a “Flex”**

knowingly and intentionally distributed approximately .98 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the 13th and Green Elementary School, a public elementary school, located at 501 North 13th Street, Reading in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 7, 2003, at Reading, in the Eastern District of  
Pennsylvania, defendant

**ALEXANDER ALAMO**  
**a/k/a “Flex”**

knowingly and intentionally distributed approximately 1.8 grams of a mixture or substance  
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 7, 2003, at Reading, in the Eastern District of Pennsylvania,  
defendant

**ALEXANDER ALAMO  
a/k/a “Flex”**

knowingly and intentionally distributed approximately 1.8 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Reading High School, a public high school, located at 801 North 13th Street, Reading in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860.

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 9, 2003, at Reading, in the Eastern District of Pennsylvania,  
defendant

**ALEXANDER ALAMO  
a/k/a “Flex”**

knowingly and intentionally possessed with intent to distribute in excess of 50 grams, that is  
approximately 83.3 grams, of a mixture or substance containing a detectable amount of cocaine  
base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 9, 2003, at Reading, in the Eastern District of Pennsylvania,  
defendant

**ALEXANDER ALAMO  
a/k/a “Flex”**

knowingly and intentionally possessed with intent to distribute in excess of 50 grams, that is approximately 83.3 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the 13th and Green Elementary School, a public elementary school, located at 501 North 13th Street, Reading in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

In violation of Title 21, United States Code, Section 860.

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 9, 2003, at Reading, in the Eastern District of Pennsylvania, defendant

**ALEXANDER ALAMO  
a/k/a “Flex”**

knowingly possessed a firearm, that is, a Taurus, Model PA140, .40 caliber handgun, serial number SVG40299, loaded with eleven rounds of ammunition and a Ruger, Model 85, 9 mm handgun, serial number 302-30741, loaded with sixteen rounds of ammunition, in furtherance of a drug trafficking offense for which he may be prosecuted in a court of the United States, that is conspiracy to distribute cocaine base (“crack”), and possession with the intent to distribute cocaine base (“crack”), in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT THIRTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 9, 2003, at Reading, in the Eastern District of Pennsylvania, defendant

**ALEXANDER ALAMO**  
**a/k/a “Flex,”**

having been previously convicted in a court of the Commonwealth of Pennsylvania of an offense punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, a loaded firearm, that is a Taurus, Model PT140, .40 caliber handgun, serial number SVG40299 and a Ruger, Model 85, 9 mm handgun, serial number 302-30741.

In violation of Title 18, United States Code, Section 922(g)(1).



**NOTICE OF FORFEITURE**

1. As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1) set forth in this Indictment, the defendant

**ALEXANDER ALAMO  
a/k/a “Flex”**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- (1) a Taurus, Model PT140, .40 caliber handgun, serial number SVG40299, and eleven live rounds of ammunition; and
- (2) a Ruger, Model 85, 9 mm handgun, serial number 302-30741 and sixteen live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**PATRICK L. MEEHAN**  
**United States Attorney**